

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LeMond Cycling, Inc.,

Plaintiff,

v.

Trek Bicycle Corporation,

Defendant/Third-Party Plaintiff,

v.

Greg LeMond,

Third-Party Defendant.

Case No. 08-CV-01010 (RHK/JSM)

**DECLARATION OF
JENNIFER M. ROBBINS IN
SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL
RESPONSES TO ITS FIRST SET OF
DISCOVERY REQUESTS**

I, Jennifer M. Robbins, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney representing LeMond Cycling, Inc. (LeMond Cycling). I make this Declaration on personal knowledge and in support of LeMond Cycling's Memorandum of Law in Support of its Motion to Compel Responses to its First Set of Discovery Requests.

2. Attached to this Declaration as Exhibit 1 is a true and correct copy of Trek's notice of breach from Loren H. Brown of Piper Rudnick to Greg LeMond, dated August 10, 2004.

3. Attached to this Declaration as Exhibit 2 is a true and correct copy of the relevant pages of the Affidavit of John Kaul authenticating August 13, 2001 transcript of conversation between Greg LeMond and John Burke.

4. Attached to this Declaration as Exhibit 3 is a true and correct copy of a letter from Denise S. Rahne of Robins, Kaplan, Miller & Ciresi L.L.P. to Ralph A. Weber of Gass Weber Mullins LLC, dated November 14, 2008.

5. Attached to this Declaration as Exhibit 4 is a true and correct copy of Trek's Response to LeMond Cycling's First Set of Discovery Requests.

6. Attached to this Declaration as Exhibit 5 is a true and correct copy of *Liberty Auto Glass, Inc. v. Allstate Fire & Cas. Ins. Co.*, Civil Action No. 06-4491 (JRT/FLN), 2008 WL 169823 (D. Minn. Jan. 16, 2008).

7. Attached to this Declaration as Exhibit 6 is a true and correct copy of *Isensee v. HO Sports Co.*, Civil No. 06-210 ADM/AJB, 2007 WL 1118274 (D. Minn. Apr. 13, 2007).

8. Attached to this Declaration as Exhibit 7 is a true and correct copy of a letter from Ralph A. Weber of Gass Weber Mullins LLC to Denise S. Rahne of Robins, Kaplan, Miller & Ciresi L.L.P., dated December 19, 2008.

9. Attached to this Declaration as Exhibit 8 is a true and correct copy of Trek's Privilege Log.

10. Attached to this Declaration as Exhibit 9 is a true and correct copy of Trek's Redaction Log for the October 3, 2008 production.

11. Attached to this Declaration as Exhibit 10 is a true and correct copy of an email from Francis Higgins to media@trekbikes.com, bates labeled LCI 06335.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 31st day of December 2008.

/s/ Jennifer M. Robbins

Jennifer M. Robbins